

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

T R A N S C R I P T of the stenographic notes of LISA FORLANO, a Notary Public and CCR, CRR, RMR, taken at the offices of Vedder Price P.C., 1633 Broadway, 47th Floor, New York, New York, 10019, on Monday, January 21, 2008, commencing at 10:45 a.m.

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<p>1 Q What did you do before that?</p> <p>2 A I was working for Alitalia.</p> <p>3 Q How long did you work for them?</p> <p>4 A From first of January of '90 until</p> <p>5 31st of March of 2007.</p> <p>6 Q When did you begin with Airone again?</p> <p>7 A The first of April, 2007.</p> <p>8 Q Why did you leave Alitalia?</p> <p>9 A I left Alitalia because the Director of</p> <p>10 Worldwide Sales told me that there was not any</p> <p>11 available position for me for the time being and so</p> <p>12 I say that because I maybe have other opportunity in</p> <p>13 the industry to negotiate an agreement with the</p> <p>14 company, to leave the company with a mutual</p> <p>15 agreement and a very good mood.</p> <p>16 Q A good what?</p> <p>17 A Good mood.</p> <p>18 Q Mood, feeling?</p> <p>19 A A good feeling, yes.</p> <p>20 Q So you left on good terms with</p> <p>21 Alitalia?</p> <p>22 A Yes, yes.</p> <p>23 Q Did they ask you to leave?</p> <p>24 A No.</p> <p>25 Q You weren't fired, right?</p>	<p>1 A If you reach an agreement like that,</p> <p>2 yes.</p> <p>3 Q How much did they pay you?</p> <p>4 A I will not answer to this question.</p> <p>5 MR. KORAL: Can we reserve and I'll</p> <p>6 talk with him later?</p> <p>7 MR. OTTINGER: Sure.</p> <p>8 BY MR. OTTINGER:</p> <p>9 Q Just to be clear, there was no problem</p> <p>10 with your employment at Alitalia that lead to your</p> <p>11 departure from that company, is that right?</p> <p>12 A Can you repeat that, please?</p> <p>13 Q Sure. Just to be clear, there was no</p> <p>14 problem -- do you know what I mean by problem?</p> <p>15 A Problem, yes.</p> <p>16 Q There was no problem with your</p> <p>17 performance at Alitalia that lead to your departure?</p> <p>18 A No, because my performance related to</p> <p>19 2006 in the agreement that has been signed that</p> <p>20 recognize also bonus for a good performance of 2006.</p> <p>21 Q You got paid a bonus for a good job in</p> <p>22 2006?</p> <p>23 A Yes.</p> <p>24 Q Were there any complaints that were</p> <p>25 lodged against you that had anything to do with you</p>
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<p>1 A No.</p> <p>2 Q Do you know what fired means in this</p> <p>3 country?</p> <p>4 A Yes, I know fired. Let's terminate. I</p> <p>5 was not absolutely.</p> <p>6 Q So you're saying that you left on your</p> <p>7 own because there wasn't an available position for</p> <p>8 you?</p> <p>9 A There was an agreement in our country,</p> <p>10 you make the agreement with the company. It's a</p> <p>11 paper that you sign.</p> <p>12 Q What's that paper called, sir?</p> <p>13 A I don't remember what the paper called.</p> <p>14 Q Is it like a severance agreement, that</p> <p>15 kind of thing?</p> <p>16 A I don't remember the title of the</p> <p>17 paper, I'm sorry.</p> <p>18 Q Were you paid money in connection with</p> <p>19 that when you left?</p> <p>20 A We reach an agreement, yes.</p> <p>21 Q Did they give you money when you left?</p> <p>22 A Yes, it's according to the Italian law,</p> <p>23 yes.</p> <p>24 Q There's a law in Italy that says when</p> <p>25 you leave a company like that, they have to pay you?</p>	<p>1 leaving the company Alitalia?</p> <p>2 A No.</p> <p>3 Q What was your position with Alitalia</p> <p>4 when you left?</p> <p>5 A I was -- the exact title was Director</p> <p>6 of Sales for Europe.</p> <p>7 Q How long did you have that title?</p> <p>8 A I have that title from June or July.</p> <p>9 I'm sorry, I don't remember very well, I think it</p> <p>10 was June of 2006. June or July, first of July,</p> <p>11 2006.</p> <p>12 Q So you first got this title of Director</p> <p>13 of Sales for Europe in June of 2006?</p> <p>14 A Yes.</p> <p>15 Q What was your title before that?</p> <p>16 A Before that, it was Senior</p> <p>17 Vice-President for North America, Mexico.</p> <p>18 Q How long did you hold that title?</p> <p>19 A From July, 2003 to June, 2006.</p> <p>20 Q Where were you located when you had</p> <p>21 that job?</p> <p>22 A Which job, in New York?</p> <p>23 Q Senior Vice-President for North</p> <p>24 America --</p> <p>25 A I was working in the head office of</p>

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<p>1 United States that is in Empire State Building.</p> <p>2 Q Empire State Building, New York City?</p> <p>3 A New York City.</p> <p>4 Q The court reporter only has two hands</p> <p>5 and she cannot record what you say and I say, so</p> <p>6 when I ask a question, just let me finish before you</p> <p>7 answer because she can't take it down when we're</p> <p>8 both talking.</p> <p>9 A Sorry, I didn't realize that.</p> <p>10 Q That's okay. So when you had the title</p> <p>11 Senior Vice-President for North America, you were</p> <p>12 located in New York City?</p> <p>13 A Yes.</p> <p>14 Q Let's get the dates down again. When</p> <p>15 were you in New York City with that title?</p> <p>16 A From when?</p> <p>17 Q Yes.</p> <p>18 A From I told you from I think July,</p> <p>19 2003.</p> <p>20 Q To June, '06?</p> <p>21 A Yes.</p> <p>22 Q What was your -- what were your</p> <p>23 responsibilities when you were serving as the</p> <p>24 Vice-President of North America between that time</p> <p>25 period?</p>	<p>1 office in New York? What's it do?</p> <p>2 A The purpose is to realize the targets</p> <p>3 of the company in terms of revenue, in terms of the</p> <p>4 profit and loss that's being decided in that quarter</p> <p>5 for North America, to materialize the target of</p> <p>6 profit and loss revenue and the supervisory</p> <p>7 activities in customer service in terms of image of</p> <p>8 the company. First of all, it's to make the company</p> <p>9 profitable, to focus on a profit and loss chart that</p> <p>10 the company gave at the beginning of the year.</p> <p>11 Q You're saying that the purpose of the</p> <p>12 New York office is to make money, is that what</p> <p>13 you're saying?</p> <p>14 A No, to reach the target in terms of</p> <p>15 profit and cost.</p> <p>16 Q How do you do that?</p> <p>17 A It's not easy to explain. It's very</p> <p>18 long. Because you have -- the revenue come from the</p> <p>19 trade with our customers, the trade or the</p> <p>20 distributions and directly from the customer through</p> <p>21 a channel, we have different channels. We have</p> <p>22 channels of the trade and direct channel. For</p> <p>23 example, Internet website is a direct channel.</p> <p>24 Q So I'm trying to understand, is the</p> <p>25 primary goal, one of the primary purpose of your</p>
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<p>1 MR. KORAL: Senior Vice-President.</p> <p>2 MR. OTTINGER: Yes.</p> <p>3 THE WITNESS: My responsibility was to</p> <p>4 supervise, to handle all activities of North</p> <p>5 America of Alitalia related to sales and sales</p> <p>6 and marketing and administration and in the</p> <p>7 last period also stations. It was different</p> <p>8 step. I didn't supervise all those activities</p> <p>9 in the beginning. It was different.</p> <p>10 BY MR. OTTINGER:</p> <p>11 Q So you're saying you got more</p> <p>12 responsibility as time went on in New York? Is that</p> <p>13 what you're saying?</p> <p>14 A During the period of United States,</p> <p>15 before when arriving in the United States, I was</p> <p>16 focus only on sales and marketing. After one year,</p> <p>17 one year and a half, they move under my</p> <p>18 responsibility the administration and only at the</p> <p>19 end in 2006, if I remember well, they put stations,</p> <p>20 airports, under my responsibility, activity of those</p> <p>21 stations.</p> <p>22 Q Thank you. When you say stations, you</p> <p>23 mean airports, is that right?</p> <p>24 A Airports, yes.</p> <p>25 Q What is the purpose of Alitalia's</p>	<p>1 office in New York, Alitalia's New York office to</p> <p>2 generate sales?</p> <p>3 A Yes.</p> <p>4 Q So it's really, the New York office,</p> <p>5 it's fair to say, it's about generating sales in</p> <p>6 North America for Alitalia?</p> <p>7 MR. KORAL: Objection.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. OTTINGER:</p> <p>10 Q Is that true?</p> <p>11 A Can you repeat the question?</p> <p>12 Q Could you read it back?</p> <p>13 (At which time the following question</p> <p>14 was read back by the reporter: "Question: So</p> <p>15 it's really, the New York office, it's fair to</p> <p>16 say, it's about generating sales in North</p> <p>17 America for Alitalia?")</p> <p>18 THE WITNESS: Yes, not only sales, of</p> <p>19 course.</p> <p>20 BY MR. OTTINGER:</p> <p>21 Q What else?</p> <p>22 A Control the cost. I mean the profit</p> <p>23 and loss is done by revenue and cost, so it was a</p> <p>24 net margin that make the difference for the company.</p> <p>25 Q Who did you report to when you were the</p>

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<p>1 Q So he was working in New York City, but 2 not for you? 3 A No, directly from Rome. 4 Q Were there any other people in the New 5 York City office who didn't report to you, but 6 instead reported to people in Rome? 7 A I told you at the beginning of my 8 experience, yes. The controller, the financial 9 controller and the stations and Mr. Gallo and one 10 person -- one manager in charge of public relation 11 was directly dependent to Rome. 12 Q You said that there were two early 13 retirement programs. If I understand you correctly, 14 they were both created by Mr. Gallo? 15 A No. It was proposed by Mr. Gallo. 16 Mr. Gallo prepare all procedures, all parameters, 17 everything in order to propose to Rome. He come to 18 me and say, this is the best things we can propose 19 to Rome in order to Rome will accept because he 20 knows the rules, how many weeks you have to offer 21 and et cetera, et cetera. 22 Q Did he come up with this early 23 retirement proposal because you or someone else 24 asked him to do it or did he do it on his own? 25 A No, we ask him which is the best legal</p>	<p>1 Q Tell me, how did you do that? How 2 many -- you said there were 200 when you started? 3 A Yes. 4 Q How many were there when you left in 5 2006? 6 A If I remember well, the exact number 7 should be around 70, 80. This number is including 8 Canada. 9 Q I'm just talking about the New York 10 City office. 11 A I'm sorry, when we use numbers, we use 12 number altogether. I was in charge of North 13 America, so I remember the number in all of North 14 America. In Mexico, we didn't have anybody. When I 15 say New York, it is United States and including 16 Canada. Canada totally was 14 number, 15 person 17 when I arrived and when I left, it was 10. I 18 remember the number of Canada. 19 Q So when I asked you earlier how many 20 employees were in the New York City office, you told 21 me 200. 22 A Yes, it was total North America. 23 Q Thank you for clearing that up. Do you 24 remember how many were actually in New York when you 25 started?</p>
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<p>1 way in order to reduce the cost without any 2 strong -- without acting very strong against the 3 employees. 4 Q What do you mean acting very strong? 5 A Let go the people without any 6 compensation. 7 Q Without any compensation? 8 A Yes. 9 Q Other than these two early retirement 10 programs that you've been talking about, were there 11 any other programs or initiatives that you know of 12 that were designed to reduce the number of employees 13 in the New York office while you were there? 14 A No. 15 Q And while you were in the New York 16 office, did any employees leave the company? 17 A I have to ask you to repeat. 18 Q Sure, no problem. While you were in 19 New York, did any employees leave the company? 20 A Yes, some employees, if I remember 21 well, leave the company by its own. 22 Q Were you able to reduce the number of 23 employees in the New York office while you were 24 there? 25 A Yes.</p>	<p>1 A In New York, I have some problem to 2 remember because at the time the office open in the 3 United States and we have Canada, we have people in 4 the airport, so if I say around 100 maybe. But I'm 5 not sure. I'm sorry. 6 Q Just so we're clear, you're saying 7 right now as you sit here that your best estimate 8 when you started working in the New York City office 9 of Alitalia in 2003 there were approximately 100 10 people in the New York City office? 11 A Yes. 12 Q Now, when you left Alitalia in March of 13 '07, how many employees were in the New York City 14 office? 15 A Probably around 40, 45 New York City 16 only? 17 Q Yes, sir. Are you familiar with the 18 American anti-discrimination laws? Do you know what 19 I mean by that? 20 A Very familiar. What do you mean 21 familiar? Expert, if I'm expert? 22 Q Do you know about them? Do you know 23 what they are? 24 A For American discrimination law? 25 Q Yes.</p>

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<p>1 MR. KORAL: Objection.</p> <p>2 BY MR. OTTINGER:</p> <p>3 Q Is that true?</p> <p>4 A If I know the law?</p> <p>5 Q Do you know what the American</p> <p>6 discrimination laws are? You understand them?</p> <p>7 MR. KORAL: Objection.</p> <p>8 THE WITNESS: Not deeply as in a</p> <p>9 lawyer, but I know that you cannot</p> <p>10 discriminate anybody for age or sex or</p> <p>11 religion or disability based on that.</p> <p>12 BY MR. OTTINGER:</p> <p>13 Q But you do know that if you made a</p> <p>14 decision about someone in America that had an</p> <p>15 adverse effect on them that was based in part on</p> <p>16 their age or gender, that that would violate the</p> <p>17 discrimination laws in America?</p> <p>18 MR. KORAL: Objection.</p> <p>19 THE WITNESS: I don't understand that</p> <p>20 question, I'm sorry.</p> <p>21 MR. OTTINGER: Let me have it read back</p> <p>22 to you.</p> <p>23 (At which time the following question</p> <p>24 was read back by the reporter: "Question:</p> <p>25 But you do know that if you made a decision</p>	<p>1 made such a decision based upon someone's gender to</p> <p>2 terminate them or demote them or not promote them,</p> <p>3 that would also be a violation of the law, right?</p> <p>4 A Based on gender, yes, I know that.</p> <p>5 Q Same with age, right?</p> <p>6 A Yes.</p> <p>7 Q If you ever made a decision to fire</p> <p>8 someone or demote them or not promote them or</p> <p>9 transfer them to a less desirable position that was</p> <p>10 based on part on their age or their gender, that</p> <p>11 would be a violation of the American laws?</p> <p>12 A Yes, I know that is a violation, yes.</p> <p>13 Q What was Ester Lorusso's position when</p> <p>14 you arrived in New York in 2003?</p> <p>15 A If I remember, Director of Marketing.</p> <p>16 Q Did that position change while you were</p> <p>17 working in New York?</p> <p>18 A Yes.</p> <p>19 Q How so?</p> <p>20 A In 2004, if I remember well, there was</p> <p>21 a company decision based on again, reduction of</p> <p>22 costs to centralize all agreements with advertising</p> <p>23 agency all over the world and make one contact with</p> <p>24 only one advertising agencies for the world not</p> <p>25 giving anymore autonomy to the branches to handle</p>
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<p>1 about someone in America that had an adverse</p> <p>2 effect on them that was based in part on their</p> <p>3 age or gender, that that would violate the</p> <p>4 discrimination laws in America?")</p> <p>5 MR. KORAL: Objection.</p> <p>6 THE WITNESS: I don't know how to</p> <p>7 answer this question. If you ask me if I know</p> <p>8 or I don't know, if any effect of actions,</p> <p>9 what kind of actions?</p> <p>10 BY MR. OTTINGER:</p> <p>11 Q For example, if you decided to</p> <p>12 terminate an employee who worked in America based</p> <p>13 upon their age -- you understand that so far?</p> <p>14 A Yes, absolutely.</p> <p>15 Q So if you decided that you wanted to</p> <p>16 terminate an employee in America that was based in</p> <p>17 part on his or her age, that that would be a</p> <p>18 violation of the American anti-discrimination laws?</p> <p>19 A Yes, I know that.</p> <p>20 Q Do you also know that if you decided to</p> <p>21 deny somebody in America an employment opportunity</p> <p>22 that was based in part on their age, that that would</p> <p>23 also violate the anti-discrimination laws?</p> <p>24 A Yes, I know.</p> <p>25 Q Likewise, a person's gender, if you</p>	<p>1 and negotiate their own contract with advertising</p> <p>2 agency and mass media position in the world. And</p> <p>3 United States used to have the highest budget in</p> <p>4 terms of money to spend because the count and</p> <p>5 because of the mass media costs. So at that time,</p> <p>6 many million dollars were allocated in our budget as</p> <p>7 being to Rome and centralize. This was the decision</p> <p>8 of the company to close all marketing office in the</p> <p>9 world or to reduce as much as possible because the</p> <p>10 majority of activity of a marketing office approach</p> <p>11 is mass media relationship and acquisition of the</p> <p>12 space and agreement with advertising agent and</p> <p>13 anything related to brand image of the company.</p> <p>14 Q How did that affect Ester Lorusso?</p> <p>15 A That was the effect that has been the</p> <p>16 decision for the company to close the marketing</p> <p>17 offices and there is no more space due to the change</p> <p>18 for the position of director and any manager</p> <p>19 position in that office. So our concern was to</p> <p>20 reallocate a person like Ester or other people</p> <p>21 working in marketing and a different position.</p> <p>22 Q What happened to Ester?</p> <p>23 A It was difficult to find a position for</p> <p>24 Ester, but finally, because the director was high</p> <p>25 level, of course, and so finally we found the</p>



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<p>1 position that we were thinking was very good for her 2 because in my impression, she had a very good 3 experience in advertising and to create a real 4 potential director you need to also have experience 5 of sales. So we offer -- in this way, we offer to 6 her the position of managing director, if I remember 7 well, of GA2000. And I told Ester that was a very 8 good opportunity because there was not a position 9 available. It was very good because she can work as 10 a managing director, have a lot of autonomy in her 11 profit and loss and she was not convinced in the 12 beginning and then she was convinced to accept the 13 position and also was a very huge increase of salary 14 included, so maybe that was one of the reasons that 15 she accepted.</p> <p>16 Q What happened to her marketing position 17 at Alitalia?</p> <p>18 A The marketing director has been 19 eliminated.</p> <p>20 Q Is there anyone -- was there any 21 marketing position still remaining in New York 22 after --</p> <p>23 A Sorry, I was ready to finish. Director 24 of Marketing has been eliminated. The manager for 25 marketing has been eliminated, so remain small</p>	<p>1 presence in the market, yes, it was coordinated by 2 me, but in terms of sales policy and everything, so 3 she come to me. We went together to visit travel 4 agency together. But in terms of company, so the 5 profit and less accountability was directed to Rome, 6 you know, in profit and loss company.</p> <p>7 Q Were there any plans in place that you 8 know of to eliminate GA2000?</p> <p>9 MR. KORAL: Objection.</p> <p>10 THE WITNESS: There was not any plan to 11 eliminate GA2000.</p> <p>12 BY MR. OTTINGER:</p> <p>13 Q What does GA2000 do?</p> <p>14 A GA2000 was focused on ethnic traffic.</p> <p>15 Q Ethnic?</p> <p>16 A Ethnic, Italians. It's a channel of 17 our trade. There are a lot of travel agency focus 18 on Italian community. It's very large in this part 19 of the United States. Not only here in New York, of 20 course. There are travel agency in Massachusetts or 21 in Arizona. But all travel agency focus on Italian 22 traffic were being supervised by GA2000. So with 23 the special agreements, special reservation.</p> <p>24 Q What happened to GA2000?</p> <p>25 A As I know, GA2000, the company decide</p>
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<p>1 activity of previous marketing office has been 2 relocated as the junior clerk that remain with small 3 deeds, of course.</p> <p>4 Q So what happened next to Ester Lorusso?</p> <p>5 A Ester, after a few weeks, accepted the 6 role of Managing Director. Of course, during this 7 period, she remained as a Director of Marketing 8 until she accepted GA2000 managing position.</p> <p>9 Q What happened next?</p> <p>10 A Next --</p> <p>11 MR. KORAL: Objection.</p> <p>12 BY MR. OTTINGER:</p> <p>13 Q Yes.</p> <p>14 A Next, I think, I don't remember, she 15 had one year experience in GA2000 and after that 16 experience I think she reach an agreement with the 17 company to move to Cargo.</p> <p>18 Q Were you involved in the decision to 19 move her to Cargo?</p> <p>20 A No, absolutely not. I already left or 21 I was leaving. But Cargo was not under my 22 jurisdiction.</p> <p>23 Q Was GA2000 under your jurisdiction?</p> <p>24 A Not really. It been a subsidy company.</p> <p>25 In terms of sales activity, sales plan and a</p>	<p>1 to close GA2000 after there was a new, stronger 2 decision by headquarter to reduce all costs and to 3 close all subsidy companies all over the world and 4 if I remember, Alitalia used to have a company with 5 aircraft, airline in Italy that was called Alitalia 6 Surprise, something like that. They close also that 7 company. It was the strategy of the company to 8 close all activities.</p> <p>9 Q Do you know if Ester Lorusso ever tried 10 to be considered for any other positions in Alitalia 11 after she started working for GA2000?</p> <p>12 A If Alitalia consider her for other 13 position?</p> <p>14 Q Do you know whether Ester Lorusso ever 15 asked to be considered for other positions in 16 Alitalia while you were working there?</p> <p>17 MR. KORAL: And while she was at 18 GA2000?</p> <p>19 THE WITNESS: While she was at GA2000, 20 this is the question?</p> <p>21 BY MR. OTTINGER:</p> <p>22 Q Or even before that?</p> <p>23 MR. KORAL: Objection.</p> <p>24 THE WITNESS: Before that, she never 25 ask me any different position than Director of</p>

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<p>1 man who told you to come here for these?</p> <p>2 MR. KORAL: Objection.</p> <p>3 THE WITNESS: I'm sorry, I was not</p> <p>4 concentrating.</p> <p>5 BY MR. OTTINGER:</p> <p>6 Q You said a lawyer told you you should</p> <p>7 come for these depositions?</p> <p>8 MR. KORAL: Objection.</p> <p>9 THE WITNESS: Which depositions, Gallo</p> <p>10 or Lorusso?</p> <p>11 BY MR. OTTINGER:</p> <p>12 Q Did somebody tell you to whom here for</p> <p>13 these depositions?</p> <p>14 A No. For Gallo I know I'm the</p> <p>15 defendant, so I was considered that it is good that</p> <p>16 I will be here, first of all.</p> <p>17 Second, lawyer told me it is good that</p> <p>18 I will be here and when Lorusso -- you ask me, the</p> <p>19 lawyer of Lorusso ask to have my testimony, I say I</p> <p>20 have nothing on contrary to give my testimony in the</p> <p>21 Lorusso case because I am here on the Gallo case.</p> <p>22 Q Does the current company you work for,</p> <p>23 you called it Airone?</p> <p>24 A Airone, it's one word.</p> <p>25 MR. KORAL: Airone.</p>	<p>1 before, yes.</p> <p>2 Q Part of an effort to consolidate the</p> <p>3 marketing advertising program, they eliminated the</p> <p>4 program she had in New York, is that right?</p> <p>5 A No, no. In Rome, it's been decided to</p> <p>6 centralize all agreement with advertising agency all</p> <p>7 over the world and most important the acquisition of</p> <p>8 the media. You know, one of the most important job</p> <p>9 of marketing in New York was relationship with</p> <p>10 media, acquisition of the space, make visibility of</p> <p>11 the company, brand of the company, all decision</p> <p>12 budget and autonomy has been centralize Rome for all</p> <p>13 over the world, not only for New York. The</p> <p>14 consequences of that, there was no reason to have</p> <p>15 anymore Director of Marketing and the Manager of</p> <p>16 Marketing in New York.</p> <p>17 Q Who made that decision?</p> <p>18 A Rome.</p> <p>19 Q Who? Who in Rome?</p> <p>20 A The company. I don't remember who.</p> <p>21 Q Where was this work moved to? Who did</p> <p>22 it?</p> <p>23 A Who did effectively -- I'm sorry?</p> <p>24 Q You said that there was a change, a</p> <p>25 centralization?</p>
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<p>1 BY MR. OTTINGER:</p> <p>2 Q Does that company have any connection</p> <p>3 to Alitalia?</p> <p>4 A No. Because probably you didn't read</p> <p>5 Italian newspaper in the last months, but Alitalia</p> <p>6 Company was in sale and one of the candidate buy</p> <p>7 Alitalia was Airone.</p> <p>8 Q Who owns Alitalia now?</p> <p>9 A Alitalia still belong to the Italian</p> <p>10 Government until negotiate and the candidate chosen</p> <p>11 by Government is Air France will decide to buy</p> <p>12 another company. It's in all the newspaper.</p> <p>13 Q It's in the newspaper?</p> <p>14 A Yes, every day.</p> <p>15 MR. KORAL: It's in the US newspapers,</p> <p>16 also.</p> <p>17 BY MR. OTTINGER:</p> <p>18 Q You said that Ester Lorusso's position</p> <p>19 as Director of Marketing was, you reorganized that</p> <p>20 out of the New York office, right?</p> <p>21 MR. KORAL: Objection.</p> <p>22 THE WITNESS: Yes.</p> <p>23 BY MR. OTTINGER:</p> <p>24 Q That's fair?</p> <p>25 A It was reorganized, you asked me</p>	<p>1 A Yes.</p> <p>2 Q Where was it centralized?</p> <p>3 A Where?</p> <p>4 Q Yes.</p> <p>5 A In Rome.</p> <p>6 Q Who took over the work that Ester</p> <p>7 Lorusso used to do?</p> <p>8 A At that time, the Director of Marketing</p> <p>9 of Alitalia, Worldwide Director of Marketing to</p> <p>10 control all budget of all over the world.</p> <p>11 Q Who is that?</p> <p>12 A Who is the person?</p> <p>13 Q Yes.</p> <p>14 MR. KORAL: Who was the person?</p> <p>15 BY MR. OTTINGER:</p> <p>16 Q Who was the person?</p> <p>17 A I don't remember the name.</p> <p>18 Q Did anyone from New York get</p> <p>19 transferred to Rome to help out in the centralized</p> <p>20 -- the new centralized program?</p> <p>21 A No, not for that.</p> <p>22 Q Do you know who Francesca Forte is?</p> <p>23 A Yes.</p> <p>24 Q She was moved from Rome to New York?</p> <p>25 A Francesca Forte is the junior clerk</p>